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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 OAKLAND DIVISION

12  
13 UNITED STATES OF AMERICA, ) NO. 4:21-MJ-71905-MAG  
14 Plaintiff, )  
15 v. ) STIPULATION AND ORDER CONTINUING  
16 JOHN RUSSELL BELLHOUSE, ) STATUS CONFERENCE AND EXCLUDING  
17 Defendant. ) TIME UNDER THE SPEEDY TRIAL ACT AND  
 ) FEDERAL RULE OF CRIMINAL PROCEDURE  
 ) 5.1(c) AND (d)  
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19 A status conference in the above-captioned case is scheduled for January 10, 2022. Counsel for  
20 the United States and counsel for the defendant jointly stipulate and request that that status conference  
21 be continued to February 7, 2022, and that time be excluded under Federal Rule of Criminal Procedure  
22 5.1(c) and (d), and the Speedy Trial Act from January 10, 2022 to February 7, 2022.

23 The government and counsel for the defendant have agreed that time be excluded under Federal  
24 Rule of Criminal Procedure 5.1 and the Speedy Trial Act so that defense counsel can continue to  
25 prepare. The government has produced discovery, and intends to make an additional production shortly,  
26 and defense counsel needs time to review the discovery. For these reasons, the parties stipulate and  
27 agree that excluding time until February 7, 2022, will allow for the effective preparation of counsel. See

28 STIPULATION TO CONTINUE AND EXCLUDE TIME  
AND ORDER

4:21-MJ-71905-MAG

1 18 U.S.C. § 3161(h)(7)(B)(iv); FRCP 5.1(c) and (d). The parties further stipulate and agree that the ends  
2 of justice served by excluding time from January 10, 2022 to February 7, 2022, from computation under  
3 the Speedy Trial Act and Federal Rule of Criminal Procedure 5.1(c) and (d) outweigh the best interests  
4 of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

5 The undersigned Assistant United States Attorney certifies that she has obtained approval from  
6 counsel for the defendant to file this stipulation, request, and proposed order.

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8 IT IS SO STIPULATED.

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10 DATED: January 7, 2022

\_\_\_\_\_  
/s/ Molly K. Priedeman  
MOLLY K. PRIEDEMAN  
Assistant United States Attorney

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12 DATED: January 7, 2022

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/s/ Shaffy Moeel  
SHAFFY MOEEL  
Attorney for the Defendant

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STIPULATION TO CONTINUE AND EXCLUDE  
TIME AND ORDER

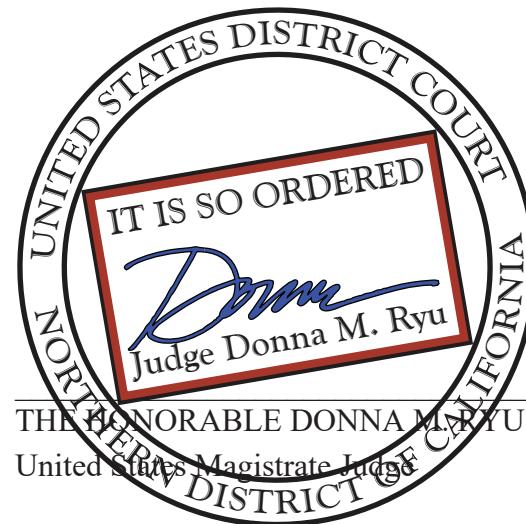
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1  
2                   ORDER

3                 Based upon the representations of counsel and for good cause shown, the Court finds that failing  
4 to exclude the time from January 10, 2022 to February 7, 2022, would unreasonably deny defense  
5 counsel and the defendant the reasonable time necessary for effective preparation and continuity of  
6 counsel, taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv). The Court  
7 further finds that the ends of justice served by excluding the time from January 10, 2022 to February 7,  
8 2022, from computation under the Speedy Trial Act and Federal Rule of Criminal Procedure 5.1(c) and  
9 (d) outweighs the best interests of the public and the defendant in a speedy trial. Therefore, and with the  
10 consent of the parties, IT IS HEREBY ORDERED that the time from January 10, 2022 to February 7,  
11 2022, shall be excluded from computation under the Speedy Trial Act and Federal Rule of Criminal  
12 Procedure 5.1(c) and (d) and the status conference is continued to February 7, 2022.

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14                 IT IS SO ORDERED.

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16 DATED: January 10, 2022



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28 STIPULATION TO EXCLUDE  
TIME AND ORDER

4:21-MJ-71905-MAG